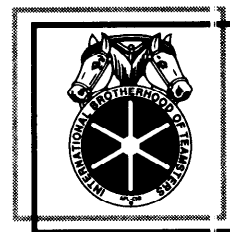


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INTERNATIONAL BROTHERHOOD OF TEAMSTERS

AFL-CIO
DEFINITION

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January 16, 2001

U.S. Department of Transportation Dockets
Docket No. FAA-2000-7909-27
400 Seventh Street SW.,
Room Plaza 401
Washington DC 20590

Dear Sir or Madam:

The International Brotherhood of Teamsters, Airline Division, representing over 50,000 aviation employees, submits the following comments to the Federal Aviation Administration regarding the agency's Notice of Proposed Rulemaking for "Improved Flammability Standards for Thermal/Acoustic Insulation Materials Used in Transport Category Airplanes", as summarized in the Federal Register (Vol. 65, No. 183) on September 20, 2000 (Docket No. FAA-2000-7909).

First, we applaud the agency's action to upgrade flammability standards for thermal/acoustic insulation materials. The proposed flammability test methods and criteria, which specifically address flame propagation and burnthrough under realistic fire conditions, will help to reduce the incidence and severity of in-flight cabin fires. Additionally, the upgraded insulation will delay the entry of post-crash fire into the aircraft cabin thereby enhancing safety and survivability during accidents by providing additional time for evacuation and rescue.

FAA research has found that current flame propagation tests do not adequately measure a material's propensity for fire-resistance under conditions of use found in many aircraft applications, specifically use in confined spaces and in areas subject to heat buildup. Under these conditions, the agency has found that even highly fire-resistant materials will propagate a fire. The new test criteria will better predict performance under realistic conditions and result in the selection of more appropriate insulation materials.

With regard to flame propagation, the IBT agrees with the agency's proposal that these standards "apply to all transport category airplanes, regardless of size or passenger capacity." (65FR 56995) This is a prudent step and one that will enhance safety of flight by reducing the potential for in-flight fires.

The second part of the proposed rulemaking addresses burnthrough. Research by numerous civil aviation authorities throughout the world has clearly and repeatedly demonstrated the value of thermal/acoustic insulation in delaying the burnthrough process in conditions simulating post-crash fires. So convincing is the data that the FAA, in the background material accompanying the NPRM, states "that without making any other change to the airplane, improved thermal/acoustic insulation can delay the entry of a post-crash fuel fire by several minutes, thus prolonging the time available for escape." (65FR56994) Research further demonstrated "that the simplest and most effective approach to improving burnthrough resistance was to improve the fire resistance of the insulation." (65FR56994) By improving the fire-resistance of insulation, the FAA will also be improving the chances for surviving a post-crash fire.

However, the FAA misses the opportunity for the greatest possible enhancement of safety and survivability by proposing to limit the burnthrough requirement to the lower half of the fuselage, and further limiting the requirement "only to aircraft with a passenger capacity of 20 or greater." (65FR 56996)

The proposed rule limiting the burnthrough protection to the lower fuselage is ostensibly justified by the argument:

The lower portion of the fuselage is the most susceptible to burnthrough from an external fuel fire because flames from such a fire would typically impinge on the fuselage from below. Therefore, the lower portion would derive the most benefit from enhanced burnthrough protection. (65FR56995)

Yet in the same paragraph, the agency goes on to state:

This point was chosen based on full-scale fire test data, as documented in the previously referenced reports, and the potential for the airplane to be off its landing gear. That is, in conditions of landing gear collapse, the airplane can roll significantly and the area most susceptible to burnthrough can be correspondingly higher on the fuselage than when the airplane is on its gear. (65FR56966) (Emphasis added)

In post-crash scenarios, an aircraft rarely comes neatly to rest in its normal upright position, whether on or off its landing gear. In accidents, the aircraft may come to rest in such a manner that the portion of the fuselage most susceptible to the flames from a fuel fire may well be a portion not covered by the proposed rule. In effect, the designation of "lower fuselage" in this context is meaningless and arbitrary. Making the burnthrough requirements applicable only to the lower fuselage makes no sense especially since, as the FAA points out "the additional costs associated with providing this same protection to the remainder of the airplane are not great..." (65FR56996) We urge the FAA to reconsider this decision.

Additionally, we would urge the FAA to extend the applicability requirement to include all transport category aircraft regardless of passenger capacity as well as aircraft operating in an all-cargo mode. With respect to limiting the applicability based on passenger capacity, we disagree with the agency's assessment that the enhanced burnthrough protection would not be of significant enough benefit to warrant the inclusion of aircraft with small passenger capacity. The Great Lakes accident at Quincy, Illinois on November 19, 1996 would certainly refute this argument. The additional time for rescue provided by improved burnthrough protection may well have saved the lives of at least 12 of the people who perished in that accident.

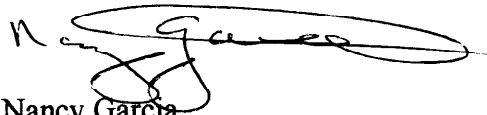
Similarly, we would urge the agency to reconsider its position excluding all-cargo aircraft. Crewmembers flying all-cargo aircraft should be afforded the same measure of protection as crew and passengers on transport aircraft. To this end, we would urge the FAA to consider a requirement for burnthrough protection on all-cargo aircraft in those areas of the fuselage where crew and non-revenue passengers may be present, and extending to those areas of the aircraft to be utilized in evacuation during an accident, e.g., the flight deck and the area behind the flight deck to include at least the most forward main cabin door.

Finally, we would urge the FAA to reconsider its position regarding a requirement to use materials complying with the burnthrough test standards when insulation materials are replaced. At the very least a more thorough study of the feasibility of such a requirement should be undertaken as the new standard is applied to newly manufactured aircraft. As the associated engineering and design concerns are addressed in new production aircraft, perhaps the cost concerns will diminish. At any rate, the cost figures provided by the FAA seem highly inflated and need to be substantiated.

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In summary, we urge the FAA to reconsider and revise the several areas of applicability reviewed above prior to promulgating the final rule. Current technologies exist to make this improved fire protection and enhanced safety cost effective. The public interest dictates that the agency pursue a more aggressive program to protect crew and passengers from in-flight and post-crash fire.

Respectfully,

A handwritten signature in black ink, appearing to read "Nancy Garcia", written over a horizontal line.

Nancy Garcia
Health and Safety

cc. Ray Benning
Vicki Gray
Don Treichler